

I am filing these comments in support of RM-10352, "Amendment of the Commission's Rules to Restrict Certain Types of Transmission On Prescribed Portions of the Amateur 160 Meter (160 m) Band".

Bandplans and amateur service self-governance on the amateur HF bands other than 160M are very effective and functional, due largely in part that they have the underlying support of an FCC regulation in Part 97.305 which separates wide-band modes (phone/image) from narrow-band (CW/digital) modes. Within these bandplans and FCC regulations., the amateur community has successfully policed itself and achieved workable and respected agreements for further subdivision, such as the separation of RTTY-PSK31-AMTOR and CW (in the narrow-band modes) or SSB and SSTV (in the wide-band modes) on the 20M ham band, for example.

The ARRL 160M bandplan is a good first step towards self-governance, but it lacks the support of an FCC ruling which regulates separation of narrow-band and wide-band modes. Every other amateur HF band from 3.5 MHz to 29.7 MHz has a supporting FCC ruling in Part 97.305 which supports amateur service self-governance, and these bandplans have historically been very successful. Where FCC regulations provide the impetus for ARRL bandplans and self-governance, band-plans are very successful and respected. Bandplans require the support of a rule making in CFR 47, Part 97.305 in order to be effective, workable%2